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**ATTORNEYS FOR MARLA REYNOLDS, TRUSTEE
OF THE SUPERIOR CREDITOR'S TRUST**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	Case No. 08-36705-BJH-11
SUPERIOR AIR PARTS, INC.	§	
	§	
DEBTOR-IN POSSESSION.	§	

**SIXTH OMNIBUS OBJECTION TO CLAIMS
(NO LIABILITY- INSURANCE RELATED CLAIMS ASSUMED UNDER PLAN)**

TO THE HONORABLE BARBARA J. HOUSER,
UNITED STATES BANKRUPTCY JUDGE:

**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN
RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES
BANKRUPTCY COURT AT 1254 EARLE CABELL FEDERAL BLDG
AND UNITED STATES COURTHOUSE, 1100 COMMERCE STREET
DALLAS, TX 75242, BEFORE THE DATE WHICH IS THIRTY (30) DAYS
FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE
CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE
MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH
HEREIN. IF A RESPONSE IS FILED, A HEARING WILL BE HELD
WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR OBJECTION IS TIMELY
REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE
UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING
THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

Marla Reynolds, in her capacity as Trustee of the Superior Creditor's Trust (the "Trustee") files this her Fourth Omnibus Objection to Claims (Duplicate Claims) (the "Objection") and respectfully represents as follows:

Jurisdiction and Venue

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

2. On December 31, 2008 (the "Petition Date"), Superior Air Parts, Inc. (the "Debtor" or "Superior") commenced this case by the filing of a voluntary petition under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the "Bankruptcy Court").

3. The deadline for filing claims was February 17, 2009 (the "Bar Date").

4. On or about August 27, 2009, the Bankruptcy Court entered an order confirming the Third Amended Plan of Reorganization (the "Plan") jointly proposed by Superior and the Official Committee of Unsecured Creditors (the "Committee"). The Plan became effective on September 28, 2009 (the "Effective Date").

5. Pursuant to the Plan, on the Effective Date, all of the Trust Assets¹ vested in the Superior Creditors Trust (the "Trust"). Marla Reynolds was appointed as Trustee of the Trust. The Trustee has authority to file objections to Claims.

¹ All capitalized terms not defined herein shall have the meaning ascribed to such term in the Plan.

Objection

6. The Trustee has reviewed and analyzed the claims filed against Superior and after reasonable investigation and due diligence, has determined that certain of those claims are defective.

7. Each of the Claims set forth on **Exhibit A** attached hereto constitutes a claim against the Debtor under an insurance policy that was assumed by the Reorganized Debtor pursuant to Section 7.1 of the Plan (each an “**Assumed Insurance Claim**”). The Trustee asserts that the Trust is not liable for any of the Assumed Insurance Claims and such should therefore be disallowed in their entirety. **Exhibit A** identifies each objectionable claim by (a) the official proof of claim number; (b) the name of the claimant; (c) the priority noted in the proof of claim; (d) the proof of claim amount; and (e) the proposed treatment of the claim.

Reservation of Rights

8. The relief requested is without prejudice to any claims or causes of action belonging to the Trustee, nor does it constitute a waiver of any claims or causes of action belonging to the Trustee. Additionally, the Trustee expressly reserves the right to further amend or supplement this Objection to assert additional bases for objecting to the Assumed Insurance Claims or the remaining proofs of claims identified on **Exhibit A** on any other ground.

Prayer

WHEREFORE, the Trustee respectfully requests that the Court enter an order (a) sustaining the Trustee’s objections to the Assumed Insurance Claims identified on **Exhibit A**; (b) expunging the official claims register in this bankruptcy cases of all Assumed Insurance Claims that this Court disallows pursuant to this Objection; and (c) granting the Trustee any and all other relief, at law or in equity, to which the Trustee may be justly entitled.

Dated: December 16, 2009
Dallas, Texas

Respectfully submitted,

BAKER & MCKENZIE LLP

By: /s/ Elliot D. Schuler

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**ATTORNEYS FOR MARLA REYNOLDS,
TRUSTEE OF THE SUPERIOR
CREDITOR'S TRUST**

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Objection was served on December 16, 2009 upon the following:

Mary Frances Durham
Office of the United States Trustee
1100 Commerce Street, Room 976
Dallas, TX 75242

Miller Thomson LLP
Suite 3000
700 9th Avenue SW South Tower
Calgary, Alberta, Canada
T2P 3VH

/s/ Elliot D. Schuler
Elliot D. Schuler

Superior Air Parts Inc.
Exhibit A

Proof of Claim	Claimant	POC Priority	POC Amount	Proposed Treatment
130	HER MAJESTY THE QUEEN IN RIGHT OF ALBERTA	GENERAL UNSECURED	7,155.92	Disallow
	LAWRENCE CHEVIGNY	GENERAL UNSECURED	400,000.00	Disallow

PROPOSED ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE: §
§ **Case No. 08-36705-BJH-11**
SUPERIOR AIR PARTS, INC. §
§
DEBTOR-IN POSSESSION. §

**ORDER GRANTING SIXTH OMNIBUS OBJECTION TO CLAIMS
(NO LIABILITY- INSURANCE RELATED CLAIMS ASSUMED UNDER PLAN)**

Upon the Sixth Omnibus Objection to Claims (Duplicate Claims) (the “Objection”) of Marla Reynolds, Trustee, of the Superior Creditor’s Trust (the “Trustee”) objecting to the Assumed Insurance Claims¹ as more fully set forth in the Objection; and the Court having jurisdiction to consider the Objection and grant the requested relief in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Objection being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and

¹ Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Objection.

1409; and the Trustee having provided proper notice of the Objection; and the Court having held a hearing to consider the requested relief (the "Hearing") with the appearances of all interested parties noted in the record of the Hearing; and the Court having found sufficient legal and factual grounds for disallowing the Assumed Insurance Claims listed on Exhibit A hereto; and the Court having determined that the legal and factual bases set forth in the Objection establish just and sufficient cause to grant the requested relief herein; and therefore, it is:

ORDERED that pursuant to section 502(b) of the Bankruptcy Code, each of the Assumed Insurance Claims listed on Exhibit A hereto are hereby disallowed and expunged in their entirety; and it is further

ORDERED that this Court hereby retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

END OF ORDER

Superior Air Parts Inc.
Exhibit A

Proof of Claim	Claimant	POC Priority	POC Amount	Proposed Treatment
130	HER MAJESTY THE QUEEN IN RIGHT OF ALBERTA	GENERAL UNSECURED	7,155.92	Disallow
	LAWRENCE CHEVIGNY	GENERAL UNSECURED	400,000.00	Disallow